

Exhibit 1

Declaration of Jeremy Pinson

I declare under penalty of perjury the following is true:

1. I am a transgender inmate housed at USP Tucson and have been undergoing hormone therapy since 2015.
2. On Jan. 17, 2020 I was attacked by inmate Oberfelt who had been paid by another inmate Shawn Cruze to do so. Subsequent to this, I spoke to Oberfelt as well as a number of other inmates who pledged not to continue any further attacks once Cruze had been transferred out of BOP custody and he was returned to the Washington Dept. of Corrections. At this time I believe no threat to me exists in USP Tucson.
3. I have received no out of cell time or exercise since April 3, 2020.
4. I have no access to a radio or television.
5. I have no access to books or magazines by U.S. Mail.
6. I have no access to an MP3 player.
7. I have no access to a telephone.
8. I have no access to social or legal visits.
9. I cant purchase stamps and BOP provides None to send mail, I sell meals to acquire stamps.
10. I have sought the only employment available yet have been told by Officer T. Schneider "we will never hire a faggot jailhouse lawyer like you."
11. I cannot buy food or hygiene products in SHU.
12. I have no access to drug rehabilitation or psychology programs in SHU.

13. I wrote to U.S. Senators Kyrsten Sinema and Martha McSally seeking assistance with BOP, and both returned a letter written to them by Barbara Blanckensee which stated "She will be returned to General Population once it is safe for her."
14. Additionally in a settlement dispute in federal court (M.D.Pa. No. 18-cv-118) BOP Attorney Jonathan Kerr represented to Judge Rambo that I would be given a promised term of settlement upon my release from the SHU. The BOP breached the settlement contract anyways.
15. In D.C. Circuit Case No. 18-5331 AUSA Peter Pfaffaroth argued my conditions in USP Tucson (argued on BOP's behalf) did not constitute imminent danger both before and after the Dec-2019 and Jan-2020 assaults including in a May 2020 oral argument after Warden Blanckensee claimed in her 3-30-20 transfer request that I was in danger.
16. At this time, I personally do not believe I am in any danger whatsoever in the USP Tucson General Population from any other inmate.
17. SIS Shirley informed me after his investigation that Shawn Cruze would be made a separatee, and Oberfelt disciplined. Later on, more than a dozen inmates sent apologies and to "bury the hatchet" now that Shawn Cruze is no longer in BOP custody.

Executed pursuant to 28 USC 1746 on 8-18-20.



Jeremy Pinson